

James E. Magleby (7247)

[magleby@mcgiplaw.com](mailto:magleby@mcgiplaw.com)

Christine T. Greenwood (8187)

[greenwood@mcgiplaw.com](mailto:greenwood@mcgiplaw.com)

Adam Alba (13128)

[alba@mcgiplaw.com](mailto:alba@mcgiplaw.com)

**MAGLEBY CATAXINOS & GREENWOOD, PC**

170 South Main Street, Suite 1100

Salt Lake City, Utah 84101-3605

Telephone: 801.359.9000

Facsimile: 801.359.9011

Attorneys for Purple Innovation, LLC

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**IN THE UNITED STATES DISTRICT COURT**

**DISTRICT OF UTAH, CENTRAL DIVISION**

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**PURPLE INNOVATION, LLC, A  
Delaware limited liability company,**

**Plaintiff,**

**v.**

**HONEST REVIEWS, LLC, a Florida  
Corporation, RYAN MONAHAN, an  
individual, GHOSTBED, INC., a  
Delaware corporation, MARC  
WERNER, an individual, ASHLEY  
WERNER, an individual, and SOCIAL  
MEDIA SHARKS, LLC, a Florida limited  
liability company,**

**Defendants.**

**STIPULATED PERMANENT  
INJUNCTION**

**Case No.: 2:17-cv-00138-DB**

**Honorable Dee Benson**

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**STIPULATED PERMANENT INJUNCTION**

The undersigned, Defendants GhostBed, Inc., Marc Werner, and Ashley Werner (collectively, the "GhostBed Defendants") specifically agree to and authorize the entry of

this Stipulated Permanent Injunction in favor of Plaintiff Purple Innovation, LLC.

(“Purple”).

The GhostBed Defendants are hereby permanently enjoined as follows:

1. The GhostBed Defendants shall not publicly, or to any customer, consumer, product reviewer, or third-party not related to or affiliated with Defendants or Purple, or in any phone conversation, online chat, or other mode of communication that is not publicly accessible, with any customer, consumer, product reviewer, or third-party not related to or affiliated with Defendants or Purple, make any statements regarding the lawsuit styled *Purple Innovation, LLC v. Honest Reviews, LLC*, Case No. 2:17-cv-00138 (D. Utah) (the “Action”), the safety of Purple’s products, or the anti-tack powder utilized by Purple on certain of its products, nor shall the GhostBed Defendants cause or encourage anyone else do so.
2. If the GhostBed Defendants are asked any questions about Purple, the safety of Purple’s products, or the anti-tack powder used by Purple in connection with some of its products, Defendants shall either refer the inquirer to Purple’s website or to Purple itself for further information or not respond at all.
3. In response to any inquiry or comment about this litigation and any associated appeals (the “Action”), the GhostBed Defendants shall state that the parties have resolved their differences.

4. Any violation of this Stipulated Permanent Injunction may be cured in accordance with the terms and conditions of Paragraph 8 of the Settlement Agreement between the GhostBed Defendants and Purple. In the event a violation is not cured, Purple shall be entitled to enforce this Stipulated Permanent Injunction and seek any other relief to which it may be entitled.
5. This Stipulated Permanent Injunction replaces this Court's Preliminary Injunction issued in the Action as it pertains to the GhostBed Defendants.
6. By their signatures below, the GhostBed Defendants hereby agree to the entry of this Stipulated Permanent Injunction and waive any and all objections to the enforceability of this Stipulated Permanent Injunction.

DATED this 23rd day of January, 2019.

BY THE COURT:


A handwritten signature in black ink, reading "Dee Benson", written over a horizontal line.

Dee Benson  
United States District Judge

Stipulated and agreed to by:

DATED: 12-11-18

GhostBed, Inc.



By: Marc C. Werner

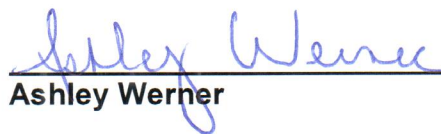
Its: CEO

DATED: 12-11-18



Marc Werner

DATED: 12/11/18



Ashley Werner